

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	
	)	
Craydeen Townsend, Jr._	)	Case No.: 20-23498-CMB
Debtor(s)	)	Chapter 13
	)	
PNC Bank, N.A.	)	
Creditor	)	
	)	
v.	)	Related to Document No. ____
	)	
Craydeen Townsend, Jr.	)	
Debtor	)	
	)	
Ronda J. Winnecour,	)	
Chapter 13 Trustee	)	
	)	
Additional	)	
Respondent	)	

**DECLARATION REGARDING MONTHLY PAYMENT CHANGE**

AND NOW, comes the Debtor(s), Craydeen Townsend, Jr., by and through his/her/their attorney, Douglas G. Hipp, Esquire, and files the within Declaration Regarding Monthly Payment Change and in support thereof respectfully represents as follows:

1. The Debtors is Craydeen Townsend, Jr.
2. Counsel for the Debtors is Douglas G. Hipp, Esquire of Hipp/Kaiser-Hipp.
3. The mortgage company of the Debtors is the PNC Bank, N.A..
4. The new proposed monthly payment payable to PNC Bank, N.A. is \$87,43 effective February 15, 2022 per the Notice of Mortgage Payment Change Filed January 20, 2022.
5. Debtor's counsel has reviewed the existing plan, recomputed the plan payment and finds that the existing plan payment is sufficient to pay the modified mortgage payment as set forth in the notice.

Respectfully submitted,

January 28, 2022  
Date

/s/Douglas G. Hipp  
Douglas G. Hipp, Esquire  
Attorney for the Debtors  
Hipp/Kaiser-Hipp  
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